

UNITED STATES DISTRICT COURT  
for the  
District of New Mexico



In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

White 2016 Dodge Challenger,  
VIN:2C3CDZFJ4GH221228, Temp Tag: 22T148749  
located at 70 Homestead Dr., Moriarty, NM 87035

Case No. 22-MR-1007

**APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the \_\_\_\_\_ District of \_\_\_\_\_ New Mexico \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. §§ 1708, 1704, 1344, 1028A	Mail Theft, Keys or Locks Stolen and Reproduced, Bank Fraud and Aggravated Identity Theft

The application is based on these facts:

See attached affidavit reviewed and approved by AUSA Sarah Mease.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Kelly McNulty, United States Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements  
telephonically sworn and electronically signed (specify reliable)

Date: June 29, 2022

City and state: Albuquerque, New Mexico

B. Paul Briones, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

IN THE MATTER OF THE SEARCH OF:  
White 2016 Dodge Challenger,  
VIN:2C3CDZFJ4GH221228, Temp Plate:  
22T148749 located at Secure Towing Yard,  
70 Homestead Dr., Moriarty, NM 87035

Case No. \_\_\_\_\_

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Kelly McNulty, being duly sworn, depose and state as follows:

1. I am a U. S. Postal Inspector with the United States Postal Inspection Service ("USPIS"), currently assigned to the Albuquerque Domicile, and have been so employed since May 2019. During that time, I have been trained to work federal criminal investigations involving the postal system, its employees, and customers. I have worked with other U.S. Postal Inspectors, police officers, and law enforcement personnel who have extensive criminal investigative experience and training.

**Search Warrant**

2. I make this Affidavit in support of a search warrant application for a White 2016 Dodge Challenger, VIN:2C3CDZFJ4GH221228, Temp Plate: 22T148749 (**SUBJECT VEHICLE**) located at Secure Towing Yard, 70 Homestead Dr., Moriarty, NM 87035.
3. I have probable cause to believe that the items described in Attachment B will be found within the aforementioned vehicle as described in Attachment A. I also believe that said vehicle contains evidence of the commission of a federal criminal offense, namely, 18 U.S.C. § 1704, Keys or Locks Stolen or Reproduced; 18 U.S.C. § 1708, Theft or Receipt of Stolen Mail Matter Generally; 18 U.S.C. § 1344, Bank Fraud; and 18 U.S.C. § 1028A, Aggravated Identity Theft.
4. The grounds for issuance of the search warrant are derived from my review of the evidence, discussions with participating agencies, and interviews of persons who have personal knowledge of the events described herein. This affidavit is limited in scope to

the information relevant to show there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

**Relevant Facts of the Investigation**

5. On June 20, 2022, Officer Jonathon Carter, Moriarty Police Department (MPD), contacted Postal Inspector Kelly McNulty, your affiant, and requested the assistance of the United States Postal Inspection Service. Officer Carter advised he was working on an investigation involving a fraudulent check and conducted a traffic stop of the **SUBJECT VEHICLE** on June 15, 2022. Again, the **SUBJECT VEHICLE** is a white 2016 Dodge Challenger, with VIN:2C3CDZFJ4GH221228, and bearing Temp Plate: 22T148749. The two individuals inside the car, Jeremy Jimenez and Evarista Rodriguez, were arrested in connection with the check fraud.
6. On the same day, the **SUBJECT VEHICLE** was towed to Secure Towing Yard, which is located at 70 Homestead Dr., Moriarty, NM 87035.
7. On June 16, 2022, Officer Carter executed a state search warrant on the **SUBJECT VEHICLE** and advised upon execution he found several pieces of mail which did not belong to the suspects, along with a large amount of Post Office parcel box keys. Officer Carter advised that a search of Rodriguez's purse incident to the arrest revealed a Post Office arrow key. An arrow key is a universal key used by postal employees to access collection boxes, outdoor parcel lockers, and cluster mail units.
8. Based on my training and experience, individuals who possess post office parcel box keys, arrow key(s), and/or multiple mail matters belonging to different individuals are using those items to engage in the offenses identified in this affidavit. Additionally, the mere possession of these items may be a criminal offense in and of itself.
9. The **SUBJECT VEHICLE** presently remains in the custody of the tow yard. I contacted the tow yard on today's date and learned that the items described above (mail matters

and postal keys) currently remain in the vehicle.

**Conclusion**

10. Based on the above described investigation, I believe probable cause exists to believe that these items, and other evidence, fruits, and instrumentalities of a violation of 18 U.S.C. §1708, Theft or receipt of stolen mail matter generally; 18 U.S.C. § 1704, Keys or Locks Stolen or Reproduced; 18 U.S.C. § 1708, Theft or Receipt of Stolen Mail Matter generally; and 18 U.S.C. § 1344, Bank Fraud, are located in the White 2016 Dodge Challenger, VIN:2C3CDZFJ4GH221228, Temp Plate: 22T148749 located at Secure Towing Yard, 70 Homestead Dr., Moriarty, NM 87035.
11. WHEREFORE, your affiant respectfully requests the Court issue a warrant authorizing members of the Postal U.S. Postal Inspection Service or their authorized representatives, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, permission to enter the vehicle in order to search for and recover evidence, fruits, and instrumentalities of the aforementioned crimes, as described in Attachment A.



**Kelly McNulty**  
U.S. Postal Inspector

Subscribed electronically and sworn telephonically to me this 29th day of June, 2022, at 3:30  
~~am~~ p.m.



\_\_\_\_\_  
Honorable Paul Briones  
**UNITED STATES MAGISTRATE JUDGE**

**ATTACHMENT A**

The Subject Vehicle is described as a white 2016 Dodge Challenger, VIN: 2C3CDZFJ4GH221228, Temporary Plate: 22T148749, currently located at Secure Towing Yard, 70 Homestead Ave, Moriarty, NM 87035.

**ATTACHMENT B**

1. Any and all mail matter addressed from or to individuals other than Jeremy Jimenez and Evarista Rodriguez located in the white 2016 Dodge Challenger, VIN:2C3CDZFJ4GH221228, Temp Plate: 22T148749;
2. Any and all documents, records, notes, data, and computer logs bearing identifying information including but not limited to names, addresses, date of birth, Social Security numbers, driver license numbers, employment information, phone numbers, relatives, and references;
3. Any and all stolen, counterfeit, and/or fraudulently obtained identification documents, including but not limited to driver licenses and identification cards, or identification documents for those individuals other than Jeremy Jimenez and Evarista Rodriguez located in the white 2016 Dodge Challenger, VIN:2C3CDZFJ4GH221228, Temp Plate: 22T148749;
4. Any and all materials used to alter identification documents or produce counterfeit identification documents, including but not limited to digital cameras, scanners, printers, signature pads, laminators, card stock, and New Mexico holograms;
5. Any and all materials used to make counterfeit checks including but not limited to scanners, printers, signature pads, check stock, ink, and check writing software;
6. Any and all financial instruments bearing the name of any individuals other than Jeremy Jimenez and Evarista Rodriguez located in the white 2016 Dodge Challenger, VIN:2C3CDZFJ4GH221228, Temp Plate: 22T148749;
7. Any and all materials including but not limited to letters, correspondence, journals, records, notes and data bearing victim information and/or other information related to or pertaining to identity theft, bank fraud, and conspiracy;
8. Any and all items that can positively be associated with mail matter that is addressed to any person other than Jeremy Jimenez and Evarista Rodriguez located in the white 2016 Dodge Challenger, VIN:2C3CDZFJ4GH221228, Temp Plate: 22T148749;
9. Pry bars and or screw drivers, which can be used to pry open post office boxes and mailboxes;
10. Any U.S. Postal Service Keys, to include but not limited to Arrow, MAL and parcel locker keys, or counterfeit keys that can be used to open mailboxes;

11. Any and all written or printed material which provides instructions or examples concerning the operation of the computer systems, computer software and/or any related device, and sign-on passwords, encryption codes or other information needed to access the computer system and/or software programs;
12. Any computer, computer hard drive, or other physical object upon which computer data can be recorded, or electronic communication devices including cellular telephones and tablets, (hereinafter, "COMPUTER(S)") as well as the electronically stored contents of such computers, that relate to the violations of 18 U.S.C. § 1708, Mail Theft, 18 USC § 1704, Keys or Locks Stolen and Reproduced, 18 USC § 1028A, Aggravated Identity Theft and 18 USC § 1344, Bank Fraud.